



December 10, 2024

**VIA EMAIL ONLY**

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Re: *Pro-Life Action Ministries et al. v. City of Minneapolis*, No. 0:23-cv-00853 (D. Minn.); Amendment of City Ordinance Chapter 405 and Offers of Judgment

Dear Counsel:

Thank you for your time in speaking with us yesterday afternoon. Please let this letter confirm that you will let us know once Mayor Frey has acted on the recent legislation amending Chapter 405.

As we also discussed, the amendment to Chapter 405 passed by the City Council on December 5, 2024, is intended to permit the conduct described in Plaintiffs’ Amended Complaint (D.E. #7) and thereby resolve the case, if Plaintiffs accept the offers of judgment, subject to determination by the Court of the amount to be awarded for Plaintiffs’ reasonable attorneys’ fees and costs.

We will discuss the amendment and offers of judgment with our clients and let you know their decision as quickly as possible.

If you have any questions or concerns, or if the above does not represent your understanding, please let us know.

Best regards,

/s/Peter Breen  
Peter Breen  
*Executive Vice President &  
Director of Litigation*

/s/B. Tyler Brooks  
B. Tyler Brooks  
*Senior Counsel*

cc: Erick Kaardal, Esq.  
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